COMMUNICATIONS SPECIALISTS, INC.

426 West Taft Avenue • Orange, California 92665-4296

(714) 998-3021 • Fax (714) 974-3420
Entire U.S.A. (800) 854-0547 • Fax (800) 424-3420

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February 25, 1993

Before the
Federal Communications Commission
Washington, DC 20544

In the matter of

Replacement of Part 90 by Part 88 to Revise the Private Land Mobile Radio Services and Modify the Policies Governing them.

PR Docket 92-235

To: The Commission

COMMENTS

Communications Specialists, Inc. submits its comments in response to the Commission's notice of Proposed Rule Making in this proceeding, concerning the frequency stability requirements of Proposed 88.425 (Table C-2).

1. Fixed and base station stability in the 150-220mHz and 420-512mHz bands should not be as unrealistic as .1PPM. This will greatly increase the cost of equipment and provide no useful benefit. Base stations communicating locally with mobile units without benefit of other infrastructure such as repeaters or trunked bases will be especially affected. These bases in smaller systems need not have any better frequency stability than the mobiles they are communicating with. A frequency stability of 1.5PPM in the 150-220mHz band and 1.0PPM in the 420-512Mhz band should be quite adequate.

2. Mobile stations with 2W or less output power should be 5.0PPM both in the 150-220mHz band and 420-512mHz band. This would allow in-house low powered paging systems to continue to be available to the small business user serving the public such as in restaurants. Alternately, a 3rd column could be added to the mobile station heading showing "120mW or less" output power at 10PPM. The "120mW to 2W" column should then be 2.5PPM for both bands. Adding a "120mW or less" column would help to mitigate the removal of 90.217 (Exemption From Technical Standards) that was so useful in Part 90. This allowed much technological innovation when Part 15 power levels were not adequate. Adding the "120mW or less" column at 10PPM will also allow full benefit of 88.1299 (b) which allows 10mW transmitters for telemetry use. These very low power units will have many life saving applications if they are cost effective.

Respectfully submitted,

Spence Porter, President
Communications Specialists, Inc.